UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (at Boston)

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION Master File No. 1:13-MD-2419-FDS MDL Docket No. 2419

) This Document Relates To:

All Cases

DEFENDANT GDC PROPERTIES MANAGEMENT, LLC'S JOINDER IN DEFENDANT AMERIDOSE, LLC'S BRIEF IN OPPOSITION TO LIBERTY INDUSTRIES, INC.'S MOTION FOR A LOCAL RULE 16.1 CONFERENCE

On June 25, 2014, Defendant Liberty Industries, Inc., filed a motion for a Local Rule 16.1 scheduling conference. (MDL Dkt. No. 1226.) Defendant Ameridose LLC filed an opposition to that motion on July 7, 2014. (MDL Dkt. No. 1246.) GDC Properties Management, LLC ("GDC"), hereby joins in and incorporates by reference Ameridose's Opposition. Specifically, CMO No. 6 remains in place, thereby staying all pleadings and discovery against the so-called affiliated defendants, including GDC, and making Liberty's request premature. Accordingly, and as stated more fully in Ameridose's Opposition, GDC respectfully requests that this Court deny Liberty's Motion for a Local Rule 16.1 Scheduling Conference.

Dated: July 7, 2014 Respectfully submitted,

/s/ Joshua A. Klarfeld

Joseph P. Thomas (OH #0040379) Ulmer & Berne LLP

600 Vine Street, Suite 2800

Cincinnati, OH 45202

Tel: (513) 698-5000/Fax: (513) 698-5001

E-mail: jthomas@ulmer.com

Joshua A. Klarfeld (OH #0079833)

Ulmer & Berne LLP

1660 W.2nd Street, Suite 1100

Cleveland, OH 44113

Tel: (216) 583-7000/Fax: (216) 583-7001

E-mail: jklarfeld@ulmer.com

Attorneys for Defendant GDC Properties, LLC

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on July 7, 2014 using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/ Joshua A. Klarfeld